

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ERIC C. PEARCE	:	CIVIL ACTION NO.:
	:	1:05-cv-11694
Plaintiff,	:	
	:	
v.	:	JURY TRIAL DEMANDED
	:	
KEITH BAUMM,	:	
ADVANCED COMPOSITE	:	
ENGINEERING D/B/A	:	
AEGIS BICYCLES,	:	
AEGIS HANDMADE CARBON	:	
FIBER BICYCLES, LLC dba	:	
AEGIS BICYCLES,	:	
AEGIS RACING BIKES USA, LLC	:	
dba AEGIS BICYCLES,	:	
FASTBIKES USA, LLC dba	:	
AEGIS BICYCLES,	:	
WYMAN-GORDON INVESTMENT	:	
CASTINGS, INC., AND	:	
STURM, RUGER & CO., INC	:	
Defendants,	:	AUGUST 3, 2007

MOTION FOR ADMISSION PRO HAC VICE

The Plaintiff, Eric C. Pearce, by and through his attorney, hereby moves pursuant to Local Rule 83.5.3(b), for the admission *pro hac vice* of Attorney Frank C. Bartlett, Jr., of Ouellette, Deganis & Gallagher, LLC, 143 Main Street, Cheshire, CT 06410.

Pursuant to his Affidavit submitted herewith as Exhibit "A", Frank C. Bartlett, Jr. is a member in good standing of every bar of every jurisdiction where he has been admitted to practice, specifically the State of Connecticut and the United States District Court for the District of Connecticut. (See attached Exhibit "A").

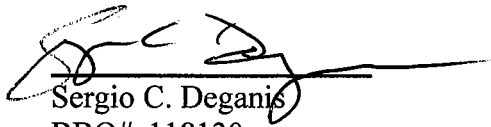
Atty. Bartlett, through his practice at Ouellette, Deganis & Gallagher, LLC, has served as counsel to the plaintiff, and by reason of this attorney-client relationship, Atty.

Bartlett has specialized skill and knowledge with respect to affairs important to the trial of this case. Further, a member of the bar of the United States District Court for the District of Massachusetts will be present at all Court proceedings and will sign all pleadings, briefs and other papers filed with the Court.

For the foregoing reasons, Eric C. Pearce respectfully requests that the Court admit *Pro Hac Vice* Frank C. Bartlett, Jr. for the duration of this lawsuit.

Respectfully submitted:

THE PLAINTIFF,
Eric C. Pearce,
By his attorneys,
Ouellette, Deganis & Gallagher, LLC

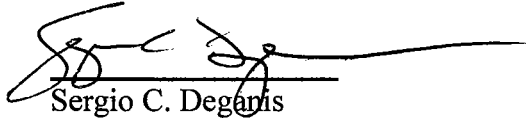
A handwritten signature in black ink, appearing to read 'Sergio C. Deganis', is written over a horizontal line.

Sergio C. Deganis
BBO#: 118130
143 Main Street, Cheshire, CT 06410
(203) 272-1157
Sdeganis@ODGWLAW.com

CERTIFICATION

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on August 3, 2007.

By:

A handwritten signature in black ink, appearing to read 'Sergio C. Deganis', is written over a horizontal line.

Sergio C. Deganis

BBO#: 118130

143 Main Street, Cheshire, CT 06410

(203) 272-1157

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EXHIBIT “A”

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CASTINGS, INC., AND	:	
STURM, RUGER & CO., INC	:	
Defendants,	:	AUGUST 3, 2007


AFFIDAVIT OF FRANK C. BARTLETT, JR.

I, Frank C. Bartlett, Jr., having been duly sworn, depose and say and hereby attest to the following facts:

- 1: I believe in the obligation of an oath;
- 2: I am of legal age, over 18;
3. I am an attorney admitted to practice in the State of Connecticut as well as the United States District Court for the District of Connecticut and am a member in good standing of the bar of every jurisdiction where I have been admitted to practice.
4. There are no disciplinary proceedings pending against me as a member of the bar of any jurisdiction.

5. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts. A motion for my admission *pro hac vice* in this case will be made by a member of this Court, Sergio C. Deganis.

Dated at Cheshire, Connecticut, this 3rd day of August, 2007

Signed: 

Name: Frank C. Bartlett, Jr.

The foregoing Affidavit was acknowledged before me this 3rd day of August, 2007.

State of Connecticut

County of New Haven

Patricia Malis
Notary Public/~~Commissioner of~~
~~Superior Court~~

PATRICIA MALIS
NOTARY PUBLIC
MY COMMISSION EXPIRES JUNE 30, 2008